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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

OWEN DIAZ,

Plaintiff,

v.

TESLA, INC. DBA TESLA MOTORS, INC.,

Defendant.

Case No. 3:17-cv-06748-WHO

**DEFENDANT'S DESIGNATIONS OF
DEMETRIC DI-AZ'S DEPOSITION
TESTIMONY**

Trial Date: March 27, 2023
Complaint Filed: October 16, 2017

DEFENDANT'S DESIGNATIONS OF DEMETRIC DI-AZ'S DEPOSITION TESTIMONY

Defendant respectfully submits the following chart identifying deposition testimony designated for the above referenced witness:

#	Lines	Deposition Excerpt	Objection/Counterdesignation
1	40:12-13	10 Q. Take your time to read Exhibit 6. It's a 11 document marked at the bottom as Tesla 156. 12 Is this a copy of your resume? 13 A. Yes.	
2	40:23 – 41:3	23 Q. Did you submit this as part of your application 14 to work at West Valley in or around August of 2015? 25 A. Yes. 1 Q. Did you submit this as part of your application 2 to work at Tesla in or around August of 2015? 3 A. Yes.	
3	150:15-151:20	150: 15 Q. In paragraph 14 you state "In approximately 16 August of 2015, Demetric's father, Owen, informed him 17 West Valley had openings for positions at the Tesla 18 factory." 19 Did your father tell you that West Valley had 20 openings? 21 A. Yes. 22 Q. Did your father encourage you to apply? 23 A. Yes. 24 Q. What did your father tell you about what it was 25 like to work at Tesla? 151: 1 A. He told me it was going to be a good experience 2 and that it would be -- like, it would be good. I 3 bought into it because I thought it was going to be the	

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		<p>4 ultimate experience. Like, oh, I get to work for Tesla.</p> <p>5 They're making modern productions to build electrical</p> <p>6 cars to make the world a better place. Like, why</p> <p>7 wouldn't I want to be a part of that?</p> <p>8 Q. Your father told you it was going to be a good</p> <p>9 experience to work at Tesla?</p> <p>10 A. Yeah. He told me it would be a good experience</p> <p>11 and it was going to be good for me.</p> <p>12 Q. And that was right before you applied in August</p> <p>13 of 2015?</p> <p>14 A. Yes.</p> <p>15 Q. Did your father tell you around the time you</p> <p>16 applied in August 2015 anything about what his work</p> <p>17 experience was like at Tesla?</p> <p>18 A. When I was applying there, he said that his work</p> <p>19 experience was going okay. From what I could tell, it</p> <p>20 was going good.</p>	
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1 DATED: February 13, 2023

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

4 By /s/ Daniel C. Posner

Daniel C. Posner

Mari Henderson

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